

UNITED STATES DISTRICT COURT  
NORTHERN DISTRICT OF OKLAHOMA

VIDEO GAMING TECHNOLOGIES,  
INC.,

Plaintiff,

vs.

CASTLE HILL STUDIOS LLC, *et al.*

Defendants.

CASE NO. 17-CV-00454-GKF-JFJ

**DEFENDANTS' MOTION TO SEAL MOTION IN LIMINE TO  
EXCLUDE EVIDENCE AND ARGUMENT REGARDING  
COMMUNICATIONS BETWEEN COUNSEL AND CHG EMPLOYEES**

Pursuant to Local Rule 79.1, and paragraph 2(f) of the Stipulated Protected Order (ECF No. 55) (the "Protective Order"), Defendants Castle Hill Studios LLC, Castle Hill Holdings LLC, and Ironworks Development LLC (together "Defendants"), hereby request that the Court enter an order sealing Defendant's unredacted Defendants' Motion In Limine To Exclude Evidence And Argument Regarding Communications Between Counsel And CHG Employees (the "Motion") and Exhibit A to the Declaration of Robert C. Gill in Support of Defendants' Motion (collectively, ECF No.148). In support of this request to seal, Defendants state as follows:

1. Portions of the Motion contain information designated by Castle Hill as Highly Confidential Information pursuant to paragraph 2(c) of the Stipulated Protective Order (ECF No. 55).

2. Exhibit A to the Declaration of Robert C. Gill consists of certain excerpts of the deposition of Paul Suggs. Castle Hill designated this document as Highly Confidential pursuant to the Stipulated Protective Order.

3. Pursuant to Local Rule 79.1, General Order 08-11, and the Protective Order, Castle Hill filed both a public, redacted Motion with public, redacted exhibits, and a sealed, unredacted Motion, and a sealed, unredacted Exhibit A.

WHEREFORE, Defendants respectfully request that the Court enter an Order sealing the Motion and Exhibit A to the Declaration of Robert C. Gill.

Dated: October 12, 2018

Respectfully submitted,

/s/ Robert C. Gill

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**CERTIFICATE OF SERVICE**

I hereby certify that on this 12th day of October, I caused a copy of the foregoing **DEFENDANTS' MOTION TO SEAL MOTION IN LIMINE TO EXCLUDE EVIDENCE AND ARGUMENT REGARDING COMMUNICATIONS BETWEEN COUNSEL AND CHG EMPLOYEES** to be filed using the Court's ECF system, which will provide electronic notification of filing to the following counsel for Plaintiff:

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